

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the sentencing memorandum filed on July 14, 2008, is true and accurate to the best information and belief, and that a copy of the foregoing document has been caused to be delivered this day upon:

Courtesy Copy to Chambers

Copy to Assistant U.S. Attorney via ECF

Copy to United States Probation Office

Copy to Defendant

Dated: July 14, 2008

/s/ DAVID M. PETERSON  
Federal Defenders of San Diego, Inc.  
225 Broadway, Suite 900  
San Diego, CA 92101-5030  
(619) 234-8467 (tel)  
(619) 687-2666 (fax)  
David\_Peterson@fd.org (email)